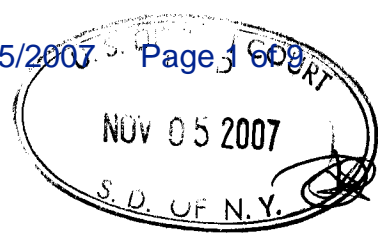


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



Bolle LA, Inc.,

No. 07 CIV 8528 (JFK)

Plaintiff,

Complaint

NOV 15 2007

v.

Global Purchasing Companies, Inc.,

Answer to Complaint

Defendant

Jury Trial Demanded

PRO SE OFFICE

The defendant Mercedes Gonzalez (Global Purchasing Companies, inc.) is answering the complaint brought forth by the Plaintiff Bolle LA, Inc and their attorneys, Baker & Hostetler LLP, Pro Se. I (Mercedes Gonzalez of Global Purchasing Companies, inc.) would like to deny the following allegations as follows:

Nature of Case

This complaint for trade name infringement, federal unfair competition, false advertising, false designations of origins and false representations under section 43(a) of the U.S. Trademark act of 1946, as amended (15 U.S.C. § 1125 (a)); and for related claims of unfair competition, trade name and service mark infringement, injury to business reputation, deceptive trade practices, false advertising and conversion under New York State law. Is without merit and I (Mercedes Gonzalez of Global Purchasing Companies, inc.) deny all of the following counts and to the best of our knowledge has not nor have not participated knowingly in any of the complaints.

Parties

1. I am not aware of the Plaintiff formal corporate status or form. I trust the information listed under Parties on the complaint.
2. The Defendant Global Purchasing Companies inc., is a corporation organized and existing in New York State Doing Business As *Dig In* which is reg. in the State of New York.

Jurisdiction

3. We (Mercedes Gonzalez Global Purchasing Companies inc., deny all of the claims related to this complaint.

Venue

4. We agree that the district for the venue should be the Southern District of New York.

Bolle's Business, Trade Name and Service mark

5. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement.
6. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement.
7. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement and we would like to see a count of Web "hits".
8. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement.
9. We deny this claim.
10. We deny this claim.
11. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement.
12. We deny this outrageous claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement.
13. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement.
14. We deny this claim and are not aware of this as being fact.
15. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement
16. We deny this claim.
17. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement
18. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement
19. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement
20. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement
21. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement

Count I

Federal unfair competition, trade name infringement, false and misleading advertising, false representations, and false designations of origin
Under section 43(a) of the US trademark act.

22. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement
23. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement
24. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement
25. We have no reference to this point.

Count II

Common Law unfair competition and trade name and service mark infringement

- 26. We deny all claims listed and as noted on the preceding paragraphs.
- 27. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement
- 28. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement
- 29. We have no reference to this point.

Count III

Injury to Business reputation under New York G.B.L. 368-d

- 30. We deny all claims listed and as noted on the preceding paragraphs.
- 31. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement
- 32. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement
- 33. We have no reference to this point.

Count IV

Deceptive trade practices under New York G.B.L. 349

- 34. We deny all claims listed and as noted on the preceding paragraphs.
- 35. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement
- 36. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement
- 37. We have no reference to this point

Count V

False Advertising Under New York G.B.L. 350

- 38. We deny all claims listed and as noted on the preceding paragraphs.
- 39. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement
- 40. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement
- 41. We have no reference to this point

Count VI

Common Law Conversion

- 42. We deny all claims listed and as noted on the preceding paragraphs.
- 43. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement
- 44. We deny this claim and are not aware of this as being fact. We would like the Plaintiff to provide documentation on said statement
- 45. We have no reference to this point

Prayer for Relief

Wherefore, plaintiff Bolle prays for judgment.

(1) That defendant's aforesaid activities constitute

We feel that the plaintiff is not initial to any judgments.

(a) We deny this claim.

(b) We deny this claim

(c) We deny this claim

(d) We deny this claim

(e) We deny this claim

(f) We deny this claim

(2) We deny this claim.

(a) No comment at this time

(b) No comment at this time

(c) No comment at this time

(3) No comment at this time

(4) No comment at this time

(5) No comment at this time

(6) No comment at this time

(7) No comment at this time

(8) No comment at this time

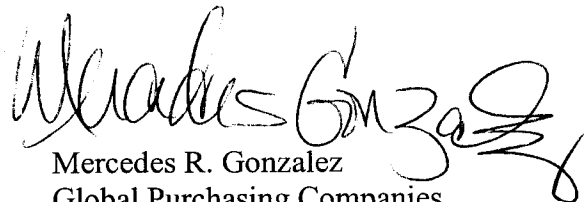
(9) No comment at this time

(10) No comment at this time

Demand for jury trail

Global Purchasing Companies feels that this is a frivolous complaint and does not wish to waste the courts time and resources on such. The Defendant is ready and willing to go to Trial with Jury if need be.

Dated October 17, 2007



Mercedes R. Gonzalez
Global Purchasing Companies
1133 Broadway Suite 908
New York, NY 10010
212-414-4001
Pro Se

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Bolle LA, Inc.,

(In the space above enter the full name(s) of the plaintiff(s)/petitioner(s).)

07 Civ. 8528 () ()

- against -

Global Purchasing Companies, Inc.

AFFIRMATION OF SERVICE

(In the space above enter the full name(s) of the defendant(s)/respondent(s).)

I, Mercedes Gonzalez, declare under penalty of perjury that I have
(name)

served a copy of the attached Answer to Complaint
(document you are serving)

upon Thomas A. Canova whose address is
(name of person served)

45 Rockefeller Plz fl 11 NYC, NY 10111
(where you served document)

by FED/Ex Tracking Number 799736163193
(how you served document: For example - personal delivery, mail, overnight express, etc.)

Dated: New York, NY
(town/city) (state)
10 31, 2007
(month) (day) (year)

Mercedes Gonzalez
Signature
1133 Broadway Suite 908
Address
NYC, NY 10010
City, State
10010
Zip Code
212-414-4001
Telephone Number



Ship Track/History Address Book Preferences Fast Ship Reports My Profile

<< Log out Home

Shipping history

The following list contains shipments you have processed using FedEx Ship Manager at fedex.com in the past 45 days. You can sort or results, or you can select a shipment to track, view details, copy to Fast Ship, cancel or reprint.

Display shipments for days Sort history by Entries per page

<input type="checkbox"/>	Ship date <input checked="" type="checkbox"/>	Company	Contact name	Destination	Tracki
<input type="checkbox"/>	Oct 18 2007	Pro Se Office	United States District Court	500 PEARL ST RM 230 NEW YORK NY 100071316 US	79258:
<input type="checkbox"/>	Oct 18 2007	Bolle LA, Inc.	Daisy Bolle	89 PARTITION ST SAUGERTIES NY 124771512 US	79828:
<input type="checkbox"/>	Oct 18 2007	Baker & Hostetler	Thomas A. Canova	45 ROCKEFELLER PLZ FL 11 NEW YORK NY 101110100 US	79973:

Pag

Track another shipment

Enter any combination of up to 30 FedEx tracking numbers or Door Tag numbers (one per line). To track by reference number or RMA number, enter a reference number or an RMA number for shipments processed on your FedEx Ship Manager at fedex.com user ID.

Track by

792582713529
798289303418
799736163193

Additional tracking options

Date range Start End

☐ Track by recipient

☐ Track exceptions only

Finished shipping FedEx Ground for the day?

Please Note

Reprint function is not available for FedEx Ground shipments.

Do not use Fast Ship when you want to use a special feature like Saturday Pickup, Saturday Delivery, Dangerous Goods, or Dry Ice. For list, see the Fast Ship Help section.



October 22, 2007

Dear Customer:

Per your request, proof of delivery letters are being provided for the following shipments:

792582713529
798289303418
799736163193

You may save or print this Batch Signature Proof of Delivery file for your records.

Thank you for choosing FedEx. We look forward to working with you in the future.

FedEx

1.800.GoFedEx 1.800.463.3339



FedEx Express
Customer Support Trace
3875 Airways Boulevard
Module H, 4th Floor
Memphis, TN 38116

U.S. Mail: PO Box 727
Memphis, TN 38194-4643

Telephone: 901-369-3600

October 22, 2007

Dear Customer:

The following is the proof of delivery you requested with the tracking number **799736163193**.

Delivery Information:

Status:	Delivered	Delivery location:	NEW YORK, NY
Signed for by:	A.HOLGUIN	Delivery date:	Oct 19, 2007 09:45
Service type:	Standard Envelope		

Shipping Information:

Tracking number:	799736163193	Ship date:	Oct 18, 2007
		Weight:	0.5 lbs.

Recipient:
NEW YORK, NY US

Shipper:
New York, NY US

Thank you for choosing FedEx Express.

FedEx Worldwide Customer Service
1.800.GoFedEx 1.800.463.3339



FedEx Express
Customer Support Trace
3875 Airways Boulevard
Module H, 4th Floor
Memphis, TN 38116

U.S. Mail: PO Box 727
Memphis, TN 38194-4643

Telephone: 901-369-3600

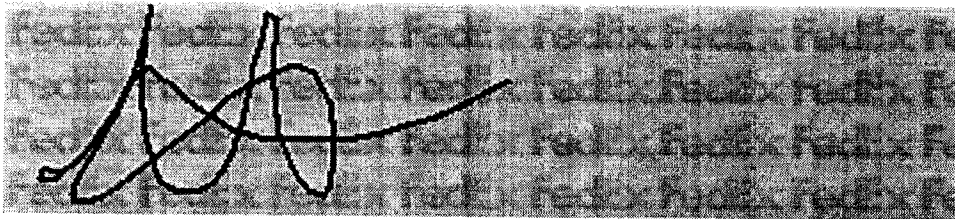
October 22, 2007

Dear Customer:

The following is the proof of delivery you requested with the tracking number **798289303418**.

Delivery Information:

Status:	Delivered	Delivery location:	SAUGERTIES, NY
Signed for by:	D.BOLLE	Delivery date:	Oct 19, 2007 12:29
Service type:	Priority Envelope		



Shipping Information:

Tracking number:	798289303418	Ship date:	Oct 18, 2007
		Weight:	0.5 lbs.

Recipient:
SAUGERTIES, NY US

Shipper:
New York, NY US

Thank you for choosing FedEx Express.

FedEx Worldwide Customer Service
1.800.GoFedEx 1.800.463.3339